

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

Index No.

SHIRIN AKTER,

Plaintiff(s)

Against

TARGET CORPORATION,

Defendant(s)

QUEENS

County as the place of trial
The basis of the venue
Plaintiff's Residence

SUMMONS

Plaintiff(s) reside(s) at
4272 80th Street
Elmhurst, New York
County of Queens**To the above named Defendant(s)**

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete, if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated: Woodbury, New York
January 10, 2022

Yours, etc.,

MARTIN L. GINSBERG, P.C.
Attorney for Plaintiff(s)
185 Froehlich Farm Boulevard
Woodbury, New York 11797
718-805-2300Defendant address (es):
c/o Secretary of State
or
1000 Nicollet Mall -TPS -3165
Minneapolis, MN 55403

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

-----X
SHIRIN AKTER,

Plaintiff,

COMPLAINT

-against-

Index No.

TARGET CORPORATION,

Defendant.
-----X

Plaintiff, SHIRIN AKTER, by her attorney, MARTIN L. GINSBERG, P.C., sets forth the following as and for her verified Complaint:

1. Defendant, TARGET CORPORATION, is a foreign corporation authorized to do and/or actually engaged in business in the State of New York.
2. Defendant, TARGET CORPORATION, is a domestic corporation organized under and operating by virtue of the laws of the State of New York.
3. On August 30, 2020, defendant, TARGET CORPORATION, was the owner of the Queens Plaza Mall, located at 8801 Queens Boulevard, Queens, New York.
4. On August 30, 2020 and for some time prior thereto, defendant, TARGET CORPORATION, maintained, managed, operated and controlled the Queens Plaza Mall located at 8801 Queens Boulevard, Queens, New York.
5. On August 30, 2020, defendant, TARGET CORPORATION, was a tenant at the Queens Plaza Mall, located at 8801 Queens Boulevard, Queens, New York.
6. On August 30, 2020 at approximately 5:00 pm, plaintiff, SHIRIN AKTER, was caused to slip and fall on the floor at the above location opposite Target on the 4th floor of said premises.
7. The above occurrence took place solely as a result of the negligence of the defendants with no culpable conduct on the part of the plaintiff.
8. As a result of the above occurrence, plaintiff, SHIRIN AKTER, was severely injured requiring medical and hospital expenses and underwent severe physical and emotional pain and suffering. Some of his injuries are of a permanent nature all to his damage in a sum in excess of the jurisdictional limits of the lower Courts of the State of New York.

WHEREFORE, plaintiff, SHIRIN AKTER, demands judgment against the defendant in a sum in excess of the jurisdictional limits of the lower Courts of the State of New York together with costs, interest and disbursements of this action.

Dated: Woodbury, New York
January 10, 2022

Yours, etc.

MARTIN L. GINSBERG, P.C.
Attorney for Plaintiff
185 Froehlich Farm Boulevard
Woodbury, New York 11797
(718) 805-2300

ATTORNEY'S VERIFICATION

The undersigned, an attorney, duly admitted to practice in the Courts of the State of New York, hereby affirms as follows:

The deponent is the attorney of record for the plaintiff(s) in the within action; the deponent has read the annexed SUMMONS AND COMPLAINT and knows the contents thereof; that the same is true to deponent's own knowledge, except as to those matters therein stated to be alleged upon information and belief, and as to those matters deponent believes them to be true. Deponent further states that the reason this Verification is made by deponent, and not by plaintiff(s), is that plaintiff(s) reside in a county other than that in which deponent maintains his office.

The grounds of deponent's belief as to all matters not stated upon his knowledge are based upon records in my file and conversations with plaintiff(s),

Affirmed the 10th day of January, 2022

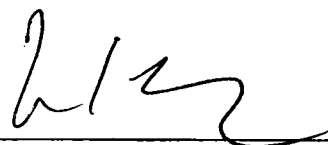

MARTIN L. GINSBERG

NOTICE OF CERTIFICATION

PLEASE TAKE NOTICE, that pursuant to Section 130-1-a, the annexed papers, the SUMMONS AND COMPLAINT are being certified that to the best of the undersigned's knowledge, information and belief, the papers and/or contentions contained therein are in accordance with the Rules pertaining to this Certification.

Dated: Woodbury, New York
January 10, 2022

Yours, etc.



MARTIN L. GINSBERG, P.C.
Attorney for Plaintiff(s)
185 Froehlich Farm Boulevard
Woodbury, New York 11797
718-805-2300

Defendant.

SUMMONS AND COMPLAINT

MARTIN L. GINSBERG, P.C.

Attorney(s) for Plaintiff

Office and Post Office Address

185 FROELICH FARM BOULEVARD
WOODBURY, NEW YORK 11797
(718) 805-2300

To

Attorney(s) for

Service of a copy of the within

is hereby admitted.

Dated,

Attorney(s) for

Sir: Please take notice

☐ NOTICE OF ENTRY

that the within is a (certified) true copy of a
duly entered in the office of the clerk of the within named court on

20

☐ NOTICE OF SETTLEMENT

that an order
settlement to the HON.

of which the within is a true copy will be presented for
one of the judges

of the within named Court, at
on the day of

20 at M.

Dated,

Yours, etc.

MARTIN L. GINSBERG, P.C.

Attorney(s) for

Office and Post Office Address

185 FROELICH FARM BOULEVARD
WOODBURY, NEW YORK 11797
(718) 805-2300

To

Attorney(s) for

SUPREME COURT QUEENS COUNTY STATE OF NEW YORK
SHIRIN AKTER

TARGET CORPORATION

- VS -

PLAINTIFF

DEFENDANT

index No. 700876/2022
Date Filed
File No.
Court Date:
AFFIDAVIT OF SERVICE

STATE OF Minnesota, COUNTY OF Ramsey :SS:

MR. Fallon Anderson, being duly sworn deposes and says:

Deponent is not a party herein, is over 18 years of age and resides in the State of Minnesota

On 1/20/2022 at 1:33 pm,

at c/o registered agent CT Corporation Services 1010 Dale Street N., St. Paul SAINT PAUL, MN 55117

deponent served the within **SUMMONS AND COMPLAINT** on: **TARGET CORPORATION**, the **DEFENDANT** therein named.

 #1 INDIVIDUAL By delivering a true copy of each to said recipient personally; deponent knew the person served to be the person described as said person therein.

X #2 CORPORATION By delivering a true copy of each to Bob Gustafson personally,

deponent knew the person so served to be the _____ of the corporation, and authorized to accept service on behalf of the corporation.

 #3 SUITABLE AGE PERSON By delivering a true copy of each to _____ a person of suitable age and discretion.
Said premises is **DEFENDANT's**: [] actual place of business [] dwelling house (usual place of abode) within the state.

 #4 AFFIXING TO DOOR By affixing a true copy of each to the door of said premises, which is **DEFENDANT's**: [] actual place of business [] dwelling house (usual place of abode) within the state.

Deponent was unable, with due diligence to find **DEFENDANT** or a person of suitable age and discretion, having called thereat

on the _____ day of _____ at _____
on the _____ day of _____ at _____
on the _____ day of _____ at _____
on the _____ day of _____ at _____

Address confirmed by _____

 #5 MAIL COPY On _____ I deposited in the United States mail a true copy of the aforementioned documents properly enclosed and sealed in a post-paid wrapper addressed to the above address. Copy mailed 1st class mail marked personal and confidential not indicating on the outside thereof by return address or otherwise that said notice is from an attorney or concerns an action against the person to be served.

1 #6 DESCRIPTION (USE WITH #1, 2 OR 3) Deponent describes the person served as aforesaid to the best of deponent's ability at the time and circumstances of the service as follows.

Sex: M Color: white Hair: Grey
Age: 50's Height: 6'-0" Weight: 160 lbs

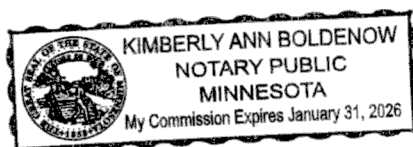
OTHER IDENTIFYING FEATURES: _____

 #7 WITNESS FEES The authorized witness fee and / or traveling expenses were paid (tendered) to the **DEFENDANT** in the amount of \$ _____

 #8 MILITARY SRVC Deponent asked person spoken to whether the **DEFENDANT** was presently in military service of the United States Government or of the State of _____ and was informed that **DEFENDANT** was not.

 #9 OTHER

NOTARY NAME & DATE



PM Legal, LLC
1235 BROADWAY 2ND FLOOR
NEW YORK, NY 10001
Reference No: 3-MLG-5955273

Shirin Akter, et. al., Plaintiff(s)
vs.
Target Corporation, et. al., Defendant(s)



APS International, Ltd.
1-800-328-7171

Law Firm Requesting Service:

PM LEGAL
Tracee Mercer
1235 Broadway, 2nd Floor
New York, NY 10001
Customer File: 3-MLG-5955273

AFFIDAVIT OF DUE AND DILIGENT ATTEMPT

--Target Corporation
Court Case No. 700876/2022

State of: MINNESOTA ss.
County of: MINNEAPOLIS

Name of Server: Fallon Anderson, undersigned, being duly sworn, deposes and says that at the time of service, s/he was over the age of twenty-one, was not a party to this action;

Documents Served: the undersigned attempted to serve the documents described as:
Summons and Complaint

Service of Process on: The undersigned attempted to serve the documents on
Target Corporation
and after due and diligent efforts, was unable to effect service.
The following is a list of the attempts made to effect service:

Attempts:

Dates/Times of

Attempted Service	Address Attempted	Reason for Non-Service
06-Jan-2022 12:23 pm	1000 Nicollet Mall TPS 316 Minneapolis, MN 55403	Must go to CT Corporation. All locked up at the Nicollet Mall address.

Signature of Server: Undersigned declares under penalty of perjury that the foregoing is true and correct.

Fallon Anderson
Signature of Server (Date)

Subscribed and sworn to before me this
8th day of January, 2022

[Signature]
Notary Public (Commission Expires)

APS International, Ltd.
APS International Plaza · 7800 Glenroy Rd.
Minneapolis, MN 55439-3122

APS File: 161382-1

